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RE: Information and exchange on practices relating to data protection and privacy

Peter van Roste

General Manager

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(by email)

Dear Peter,

As part of our effort concerning GDPR, we are looking into the diverse practices that exist across the domain name ecosystem in addressing privacy and data protection law, which could inform how a registrar / registry can be compliant with GDPR.

We would be interested to learn about and exchange on the practices put in place by registries in the CENTR community for the extensions they are responsible for, as I understand that several of them have worked to put in place the appropriate solutions and mechanisms to be consistent with the legislation.

Would CENTR and its community be able to share information about its data collection, processing and transfer practices, and where these practices are stipulated (e.g. in contracts with registrars) ?

It would be particularly helpful to have information on the following elements:

- How was the current policy (practice) developed? Who participated in developing the policy? Who approved it?
- Have any DPAs (or other relevant public body) expressed an opinion on the WHOIS practices concerning .fr and/or the other extensions operated by registries in the CENTR community?
- How are requests for access to additional details evaluated? Is there a programme for accrediting or approving trusted organizations or individuals for access to full registration details? What criteria and procedures do they use for evaluating who gets access to additional registration data?

- How do registries in the CENTR community determine or verify which registrants are individuals vs organizations?
- What have been the advantages and disadvantages of operating under the current WHOIS policy?

Thanks,

Best regards,



Jean-Jacques Sahel

Managing Director, Europe